



Office of Environment, Safety and Health

OE Noncompliance Tracking System Report Structured Approach To Decision Making

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Why is an NTS Report Structured Approach To Decision Making Needed?

- ✱ **Standardizes the initial OE evaluation of NTS reports**
- ✱ **Assures all contributing factors are considered**
- ✱ **Provides a supportable basis of NTS report evaluation to external stakeholders**
- ✱ **Assures only those NTS noncompliances with the greatest safety significance receive further evaluation**

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What is the Outcome of the Evaluation?

- ✱ **The outcome of the process is a determination whether or not to proceed with further investigation**
- ✱ **The process does not determine or recommend an enforcement outcome**

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How Was the Process Developed?

- ✱ **Approach Based on the NRC Significance Determination Process**
- ✱ **Supplemented with a consequence matrix**

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The Process

- ✱ **New NTS reports are assigned by the Docket Clerk to OE enforcement specialists based on site assignments**
- ✱ **The enforcement specialist then applies the evaluation methodology to each assigned NTS report**

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The Process *(cont'd)*

Safety Levels Overcome

- ✱ **Based on a defense in depth approach**
- ✱ **Three levels of safety are considered**
 - Hazard Controls/Safety Controls Measures
 - Event Prevention
 - Mitigation Measures/Features
- ✱ **A summation of the number of safety levels overcome is determined**

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The Process *(cont'd)*

Consequence Determination

- ✱ **A consequence determination is made based on actual or potential radiological consequences to the worker (contamination or exposure), public, or environment**



The Process *(cont'd)*

Determination of Safety Significance

- ✦ **Based on the number of safety levels overcome and the result of the consequence determination, a safety significance determination is made**



The Process *(cont'd)*

Other Contributing Factors

- ✱ For those NTS noncompliances which were determined to be of *high* or *serious* safety significance, the OE would recommend further investigation
- ✱ For those NTS noncompliances which were determined to be of *marginal* or *low* safety significance, a consideration of other contributing factors is made

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The Process *(cont'd)*

Other Contributing Factors

- ✱ **In general, if two or more contributing factors are found to be associated with the NTS noncompliance, then a recommendation is made to proceed with further investigation**
- ✱ **If one or no contributing factors are found, the NTS report is recommended to be tracked to closure**



The Process *(cont'd)*

Documentation and Presentation

- ✱ **The OE enforcement specialists document their safety significance evaluation and present their results at the weekly OE staff meeting**
- ✱ **A collegial discussion of the noncompliance takes place and decision is made to accept or reject the enforcement specialist's recommendation**